



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4WD-RPB

NOV 26 2001

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

SUB: Comments on RFI Report
Grenada Manufacturing, LLC
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

The Environmental Protection Agency (EPA) has reviewed the facility's response to EPA's comments dated June 12, 2001 on the RFI Report at the Grenada Manufacturing Plant in Grenada, Mississippi dated January 2001. The facility's response to most of the comments was adequate.

At this time the Wet Well, Solid Waste Management Unit (SWMU) 12, is still in operation and is part of the waste water treatment system at the plant; therefore, EPA will not require soil or ground water testing. However, EPA will require integrity testing and inspection of the unit every five years, beginning this year. The unit is constructed of concrete with a painted on liner. From 1977 to 1993 the unit received discharge from the Chromium Destruct Pit, hence EPA's concern with chromium contamination in the soil. The discharge to the Wet Well was highly corrosive (alkaline), hence EPA's concern with the integrity of the unit. The facility should plan on testing soil adjacent to the unit prior to closure. EPA recommends that Grenada add a paragraph to the RFI Report for SWMU 12, similar to that added to the RFI for SWMU 13.

The final remaining major issue in the RFI Report appears to be the question of indoor air contamination in the Main Plant Building by volatile organic compounds (VOCs). The plumes of Tetrachloroethene (TCE) and its degradation products are found under the inhabited Main Plant Building at Grenada Manufacturing. Whenever these circumstances are present, indoor air is an environmental concern and can affect the facility's attainment of human health protection.

Preliminary evaluation by EPA of the potential for vapor intrusion into indoor air in the Main Plant Building indicates the possibility of indoor air contamination at the Grenada Manufacturing facility. The process sewers that run under the Main Plant Building, or the slab on which the plant is built, may provide a conduit for VOC contamination to vaporize or off-gas from the groundwater or soil into the building. Levels of Trichloroethene; cis-1,2 Dichloroethene; and Vinyl Chloride are extremely high in the ground water, (Table 2-2, RFI Report, January 2001) and exceed the target ground water concentrations corresponding to indoor air concentrations exceeding maximum levels protective of human health (Table 2, Draft Vapor Intrusion Guidance, USEPA, October 23, 2001).

In its response to EPA's RFI comment that the impact of VOCs on indoor air should be considered, the facility presented data for VOC concentrations in soil. However, this data was not related in any quantitative way to indoor air concentrations, and the issue was not addressed in the RFI. For the foregoing reasons, EPA is requiring the facility to conduct a 'Vapor Intrusion Assessment' using the draft guidance issued by EPA October 23, 2001. This is considered part of the RCRA Investigative process, but, EPA would prefer that the facility finalize its RFI Report now and present the 'Vapor Intrusion Assessment' separately. The 'Vapor Intrusion Assessment' will be due ninety days (90) from receipt of this letter.

Thank you for the electronic copy of the RFI Report on compact disc. You may continue to update it as appropriate until all comments are resolved. If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 563-8469.

Sincerely,



Narindar M. Kumar,
Chief, RCRA Programs Branch

cc: Louis Crawford, MDEQ
Dave McCabe, Textron Automotive
John Bozick, Arvin Meritor Automotive

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MR DON WILLIAMS PLANT ENVI COORD
GRENADA MANUFACTURING LLC
635 HIGHWAY 332
GRENADA MS 38901

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☐ Addressee

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